

Exhibit 1



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May 6, 2014

VIA FACSIMILE
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Re: *Civil Action No. 6:13-cv-711; Webb, et al. vs. Livingston, et al.; In the United States District Court, Eastern District of Texas, Tyler Division;*
Civil Action No. 6:13-cv-712; Adams, et al. vs. Livingston, et al.; In the United States District Court, Eastern District of Texas, Tyler Division;
Civil Action No. 6:14-cv-00093; Togonidze vs. Livingston, et al.; In the United States District Court, Eastern District of Texas, Tyler Division;
CONSOLIDATED ACTIONS

Civil Action No. 3:12-cv-02037; McCollum, et al. v. Livingston, et al.; In the United States District Court, Northern District of Texas – Dallas Division

Civil Action No. 4:13-cv-03369; Martone v. Livingston, et al.; In the United States District Court, Southern District of Texas, Houston Division;

Civil Action No. 2:13-cv-319; Hinojosa v. Livingston, et al.; In the United States District Court, Southern District of Texas, Corpus Christi Division;

Dear Counsel:

I am writing in an effort to schedule two depositions. Please let me know Robert Shaffer's availability for deposition. Additionally, we would like to schedule a deposition for TDCJ's equivalent person regarding document preservation and retrieval of electronically stored information for each of the above-cited cases. (My impression is that Mr. Shaffer is the best person at UTMB to depose regarding these issues. If that is incorrect, please let me know.)

Because our previously scheduled May 13 deposition is not going forward, I suggest trying to do both depositions on May 13. I suggest we do these in Austin at the OAG offices, beginning at 9 am. If May 13 no longer works, I suggest May 14, 16, 23, or 28. We'd like both depositions to be completed by May 29.

Please let me know, preferably by Thursday of this week, if you have any problems with this May 13 date and we will make an effort to work together with you to find a mutually convenient time in the next two-three weeks to take these depositions. Bruce, please also let me know the identity of TDCJ's IT person so I can put it in the notice.

Please note that these depositions will be under all the above-cited cases. Once we finalize a date, I'll send appropriate notices. Please call me at 512-623-7727 if you have any questions. I look forward to working with you in these cases.

Sincerely,



Sean Flammer